

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

ALDEN BELLOW, ET AL

\* DOCKET NO.: 16-00614

VERSUS

\* JUDGE ROBERT G. JAMES

SABINE PASS LNG, LP., ET AL

\* MAG. JUDGE CAROL B. WHITEHURST

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**THIRD SUPPLEMENTAL AND AMENDING COMPLAINT**

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NOW INTO COURT, through undersigned counsel, comes the complainants herein, **ALDEN BELLOW, ARLENE BELLOW, KATHRYN BELLOW and ADAM BELLOW**, who supplement and amend their Original Complaint, First Supplemental and Amending Complaint and Second Supplemental and Amending Complaint as follows, to-wit:

I.

By supplementing and amending the Caption of the Original Complaint, First Supplemental and Amending Complaint and Second Supplemental and Amending Complaint to read as follows:

**“ALDEN BELLOW,  
ARLENE BELLOW,  
KATHRYN BELLOW  
AND ADAM BELLOW**

**\* CIVIL ACTION NO. 16-00614**

**VERSUS**

**\* JUDGE ROBERT G. JAMES**

**SABINE PASS LNG, LP,  
SABINE PASS  
LIQUEFACTION, LLC,  
AAA RENTALS/AAA PARTY  
SUPPLY, INC. AND NATIONAL  
FIRE INSURANCE COMPANY  
OF PITTSBURGH, PA \* MAG. JUDGE CAROL B. WHITEHURST”**

**II.**

By Supplementing and Amending paragraph 1 of the Original Complaint, First Supplemental and Amending Complaint and Second Supplemental and Amending Complaint to read as follows:

“1.

Made defendants herein are:

- 1) **SABINE PASS LNG, LP**, (hereinafter “Cheniere”) a foreign partnership authorized to do and doing business in the State of Louisiana, having appointed Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, LA 70802, as its agent for service of process; and
- 2) **SABINE PASS LIQUEFACTION, LLC**, (hereinafter “Cheniere”) a foreign corporation a foreign corporation authorized to do and doing business in the State of Louisiana, having appointed Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, LA 70802, as its agent for service of process;
- 3) **AAA RENTALS/AAA PARTY SUPPLY, INC.**, (hereinafter “AAA”)a foreign corporation who may be served through its registered agent for service of process, Bradley Binks, 2496 Filmore, Beaumont, TX 77703; and

- 4) **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURG, PA**, (hereinafter “National Union Fire” a foreign insurance company authorized to do and doing business in the State of Louisiana and who may be served through its agent for service of process, Louisiana Secretary of State, 8585 Archives Avenue, Baton Rouge, LA 70809,

who are all justly and truly indebted, unto complainant herein, jointly and in solido, for the reasons set forth below:”

### III.

By adding a paragraph 4(a) to immediately follow paragraph 4 of Original Complaint, First Supplemental and Amending Complaint and Second Supplemental and Amending Complaint to read as follows:

#### “4(a)

Upon information and belief, Defendant, Cheniere, was provided with liability insurance by **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURG, PA** at the time of the accident sued upon. Pursuant to LSA R.S. 22:655 and the Maritime Law, Complainant is entitled to and does hereby assert this direct action against **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURG, PA.**”

### IV.

By Supplementing and Amending the pray of the Original Complaint, First

Supplemental and Amending Complaint and Second Supplemental and Amending Complaint to read as follows:

“WHEREFORE, COMPLAINANT, ALDEN BELLOW, prays that there be judgment herein in his favor and against the defendants, SABINE PASS LNG, LP, SABINE LIQUEFACTION, LLC, AAA RENTALS/AAA PARTY SUPPLY, INC., and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURG, PA, jointly and in solido, in the amount of THREE MILLION DOLLARS (\$3,000,000.00), together with legal interest from the date of injury until paid and for all costs of these proceedings, including witness fees and expenses.

WHEREFORE, COMPLAINANT, ARLENE BELLOW, prays that there be judgment herein in his favor and against the defendants, SABINE PASS LNG, LP, SABINE LIQUEFACTION, LLC, AAA RENTALS/AAA PARTY SUPPLY, INC., and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURG, PA, jointly and in solido, in the amount of TWO HUNDRED FIFTY THOUSAND DOLLARS (\$250,000.00), together with legal interest from the date of injury until paid and for all costs of these proceedings, including witness fees and expenses.

WHEREFORE, COMPLAINANT, KATHRYN BELLOW, prays that there be judgment herein in her favor and against the defendants, SABINE PASS LNG, LP, SABINE LIQUEFACTION, LLC, AAA RENTALS/AAA PARTY SUPPLY,

INC., and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURG, PA, jointly and in solido, in the amount of ONE MILLION FIVE HUNDRED DOLLARS (\$1,500,000.00), together with legal interest from the date of injury until paid and for all costs of these proceedings, including witness fees and expenses.

WHEREFORE, COMPLAINANT, ADAM BELLOW, prays that there be judgment herein in his favor and against the defendants, SABINE PASS LNG, LP, SABINE LIQUEFACTION, LLC, AAA RENTALS/AAA PARTY SUPPLY, INC., and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURG, PA , jointly and in solido, in the amount of TWO HUNDRED FIFTY THOUSAND DOLLARS (\$250,000.00), together with legal interest from the date of injury until paid and for all costs of these proceedings, including witness fees and expenses.

COMPLAINANTS FURTHER PRAY for process in due form against defendants, SABINE PASS LNG, LP, SABINE LIQUEFACTION, LLC, AAA RENTALS/AAA PARTY SUPPLY, INC., and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURG, PA, for trial by jury and for all general and equitable relief.”

## VII.

Complainants reiterate the remaining allegations and prayers of their Original

Complaint, First Supplemental and Amending Complaint and Second Supplemental and Amending Complaint as if copied herein in extenso.

**WHEREFORE, COMPLAINANTS PRAY** that the defendants be cited and served herein and be cited to appear and answer fully and completely the allegations made herein.

RESPECTFULLY SUBMITTED:

MORROW, MORROW, RYAN & BASSETT

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**ARLENE BELLOW, KATHRYN BELLOW**  
**AND ADAM BELLOW**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 4, 2016, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

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/s/James P. Ryan  
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